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TROUTMAN PEPPER HAMILTON SANDERS LLP  
600 Peachtree St. NE #3000  
Atlanta, GA 30308 (*Corporate Office*)  
*Attorneys for Defendants*  
*Nationstar Mortgage LLC, dba Mr. Cooper*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SFR INVESTMENTS POOL 1, LLC,

Plaintiff,

v.

NATIONSTAR MORTGAGE LLC, DBA  
MR. COOPER; DOES 1 through X; and  
ROE CORPORATIONS I through X,  
inclusive,,

Defendant.

Case No. 3:22-cv-00128-MMD-CLB

**STIPULATION AND ORDER TO EXTEND  
DEADLINES TO FILE REPLY IN  
SUPPORT OF NATIONSTAR  
MORTGAGE LLC d/b/a MR. COOPER'S  
MOTION FOR DISMISS  
(SECOND REQUEST)**

On February 01, 2022, SFR Investments Pool 1, LLC ("SFR") filed a Complaint in the Second Judicial District Court, Case No. CV22-00164, against Defendant Nationstar Mortgage LLC d/b/a Mr. Cooper ("Nationstar").

On March 10, 2022, Nationstar filed a Notice of Removal to Federal Court Based on Diversity Jurisdiction in the United States District Court, District of Nevada, Case no. 3:22-cv-00128. Thereafter, Nationstar filed its Motion to Dismiss Plaintiff's Complaint on May 2, 2022. SFR filed its Opposition to Nationstar's Motion to Dismiss on May 20, 2022.

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Accordingly, the parties stipulated as follows:

1. Defendant Nationstar shall file its Reply in Support of its Motion to Dismiss on or before June 24, 2022;

2. Defendant, and its assigns or successors, agrees to refrain from setting the foreclosure sale of the real property located at 6461 Meadow Hill Drive, Reno, Nevada 89509, until such time as this Court rules on the motion for preliminary injunction; and

3. Both parties represent this stipulation is not made with any intent to delay or prejudice either party.

DATED June 3, 2022.

By: /s/ Vanessa M. Turley  
 Vanessa M. Turley, Esq.  
 Nevada Bar No. 14635  
 8985 S. Eastern Ave., Ste. 200  
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[vanessa.turley@troutman.com](mailto:vanessa.turley@troutman.com)  
 Attorneys for Defendants Nationstar  
 Mortgage LLC, dba Mr. Cooper

By: /s/ Chantel M. Schimming (w/consent)  
 Chantel M. Schimming, Esq.  
 Nevada Bar Number 8886  
 HANKS LAW GROUP  
 7625 Dean Martin Drive, Suite 110  
 Las Vegas, Nevada 89139  
 Telephone: (702) 758-8434  
 Email: chantel@hankslg.com  
 Attorney SFR Investments Pool 1, LLC

IT IS HEREBY ORDERED that Nationstar shall file its Reply in Support of its Motion to Dismiss on or before June 24, 2022.

Dated: June 3, 2022



UNITED STATES DISTRICT COURT

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of Troutman Pepper Hamilton Sanders LLC, and that on the \_\_\_\_th day of June, 2022, I caused to be served a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND DEADLINES TO FILE REPLY IN SUPPORT OF NATIONSTAR'S MOTION TO DISMISS**, in the following manner:

☒ **(ELECTRONIC SERVICE)** document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by the Court's facilities to those parties listed on the Court's Master Service List as follows:

Chantel M. Schimming, Esq.  
HANKS LAW GROUP  
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Email: [chantel@hankslg.com](mailto:chantel@hankslg.com)  
Attorneys for SFR Investments Pool 1, LLC

/s/ Janet Kusch  
An employee of Troutman Pepper Hamilton  
Sanders LLC

**Archived:** Friday, June 3, 2022 12:30:03 PM

**From:** [Turley, Vanessa M.](#)

**Mail received time:** Fri, 3 Jun 2022 11:58:01

**Sent:** Fri, 3 Jun 2022 15:58:00

**To:** [Kusch, Janet Owen](#)

**Subject:** FW: Backdated Property Payoff Quotes - Drafi, Paguia, Schwartz

**Importance:** Normal

**Sensitivity:** None

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Hi,

Can you change the below and submit the following SAOs:

1. Drafi
2. DiPietro
3. Paguia
4. Schwartz

They are all in iManage under pleadings (should be the first thing)

Thanks!!!

**Vanessa M. Turley**

Attorney

**troutman pepper**

Direct: 470.832.5572

[vanessa.turley@troutman.com](mailto:vanessa.turley@troutman.com)

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**From:** Chantel Schimming <[chantel@hankslg.com](mailto:chantel@hankslg.com)>

**Sent:** Friday, June 3, 2022 11:56 AM

**To:** Turley, Vanessa M. <[Vanessa.Turley@troutman.com](mailto:Vanessa.Turley@troutman.com)>; Karen Hanks <[karen@hankslg.com](mailto:karen@hankslg.com)>

**Cc:** Candi Fay <[candi@hankslg.com](mailto:candi@hankslg.com)>; STAFF HANKSLG <[staff@hankslg.com](mailto:staff@hankslg.com)>; Balser, Justin D. <[Justin.Balser@troutman.com](mailto:Justin.Balser@troutman.com)>; Wight, Brody R. <[Brody.Wight@troutman.com](mailto:Brody.Wight@troutman.com)>; Streible, Elizabeth M. <[Elizabeth.Streible@troutman.com](mailto:Elizabeth.Streible@troutman.com)>

**Subject:** RE: Backdated Property Payoff Quotes - Drafi, Paguia, Schwartz

**EXTERNAL SENDER**

Vanessa,

Change the signature line on Meadow Hill from Karen to me and you can use my e-signature on each of the SAO's.

Thanks,  
Chantel



*Chantel M. Schimming, Esq.*

*Associate Attorney*

**HANKS LAW GROUP**

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**From:** Turley, Vanessa M. <[Vanessa.Turley@troutman.com](mailto:Vanessa.Turley@troutman.com)>

**Sent:** Friday, June 3, 2022 8:44 AM

**To:** Chantel Schimming <[chantel@hankslg.com](mailto:chantel@hankslg.com)>; Karen Hanks <[karen@hankslg.com](mailto:karen@hankslg.com)>

**Cc:** Candi Fay <[candi@hankslg.com](mailto:candi@hankslg.com)>; STAFF HANKSLG <[staff@hankslg.com](mailto:staff@hankslg.com)>; Balser, Justin D. <[Justin.Balser@troutman.com](mailto:Justin.Balser@troutman.com)>;

Wight, Brody R. <[Brody.Wight@troutman.com](mailto:Brody.Wight@troutman.com)>; Streible, Elizabeth M. <[Elizabeth.Streible@troutman.com](mailto:Elizabeth.Streible@troutman.com)>

**Subject:** RE: Backdated Property Payoff Quotes - Drafi, Pagua, Schwartz

Hi all,

Happy Friday! Sorry to keep the emails coming, but here are the revised SAOs for: Schwartz/Meadow Hill; DiPietro/Brilliant Summit; Pagua/Fox Creek; and Drafi/Cantina Creek with the payoff quote paragraph omitted. Please let me know if I may affix your e-signature to the Stipulations.

Thank you,

**Vanessa M. Turley**

**Attorney**

**troutman pepper**

Direct: 470.832.5572

[vanessa.turley@troutman.com](mailto:vanessa.turley@troutman.com)

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**From:** Turley, Vanessa M.

**Sent:** Friday, June 3, 2022 11:26 AM

**To:** 'Chantel Schimming' <[chantel@hankslg.com](mailto:chantel@hankslg.com)>; Karen Hanks <[karen@hankslg.com](mailto:karen@hankslg.com)>

**Cc:** Candi Fay <[candi@hankslg.com](mailto:candi@hankslg.com)>; STAFF HANKSLG <[staff@hankslg.com](mailto:staff@hankslg.com)>; Balser, Justin D. <[Justin.Balser@troutman.com](mailto:Justin.Balser@troutman.com)>;

Wight, Brody R. <[Brody.Wight@troutman.com](mailto:Brody.Wight@troutman.com)>; Streible, Elizabeth M. <[Elizabeth.Streible@troutman.com](mailto:Elizabeth.Streible@troutman.com)>

**Subject:** Backdated Property Payoff Quotes - Drafi, Pagua, Schwartz

Hi Chantel,

Attached are the payoff quotes for the three properties where NRS 107.200 requests were made. We were able to obtain the backdated payoff quotes *as of the day of the request*. I hope this allows you to further consider payoffs for these properties. Please let me know if you have any questions or concerns.

Thanks!

Case Name:	NRS 107.200 request made:	Date Request Made:	Date Statement/Note was due:	NSM/MRC file number:	Fannie Mae file number:
1. Drafi	Yes	October 13, 2021	November 3, 2021	608802849	1700949269
2. Paguia	Yes	November 22, 2021	December 13, 2021	658853635	4005608009
3. Schwartz	Yes	October 12, 2021	November 2, 2021	607403490	1701661194
4. Sinagulia	No			660636630	1682856593

## Vanessa M. Turley

### Attorney

Direct: 470.832.5572

[vanessa.turley@troutman.com](mailto:vanessa.turley@troutman.com)

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### troutman pepper

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